

**KNIGHT & RYAN PLLC**

Robert A. Ryan, #12084

robert@knightryan.com

Scott A. Knight, #9083

scott@knightryan.com

8880 W. Sunset Road Suite 130

Las Vegas, Nevada 89148

Tel: (702) 462-6083

Fax: (702) 462-6084

**DLA PIPER LLP (US)**

Darryl Tarver (*pro hac vice* forthcoming)

darryl.tarver@us.dlapiper.com

Sima G. Fried (*pro hac vice* forthcoming)

sima.fried@us.dlapiper.com

Alexa Ain (*pro hac vice* forthcoming)

alexa.ain@us.dlapiper.com

650 S Exeter Street Suite 1100

Baltimore, Maryland 21202-4576

Tel: 410.580.3000

Fax: 410.580.3001

*Attorneys for Defendants*

*MGM Resorts International,*

*The Mirage Casino-Hotel, LLC,*

*and New Castle, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MCKENZIE KELLER,

Plaintiff,

v.

MGM RESORTS INTERNATIONAL, et al.,

Defendant.

Case No. 2:24-cv-02027-JCM-MDC

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
AMENDED COMPLAINT**

**(First Request)**

Plaintiff, Marcy C. (“Plaintiff”), and Defendants, MGM Resorts International, The Mirage Casino-Hotel, LLC, New Castle, LLC, Treasure Island LV, LLC, Parball Newco, LLC, PHWLTV,

1 LLC, Rio Properties, LLC, Venetian Las Vegas Gaming, LLC, and Wynn Las Vegas, LLC  
2 (“Defendants”), hereby stipulate and agree as follows:

3 1. On July 17, 2025, This Court entered an Order [ECF No. 135], granting several  
4 pending Motions to Dismiss, dismissing Plaintiff’s claims without prejudice and with leave to  
5 amend.

6 2. On August 1, 2025, Plaintiff filed her First Amended Complaint [ECF No. 138],  
7 which added and removed parties.

8 3. Pursuant to Fed. R. Civ. P. 15(a)(3), the deadline for all Parties to respond to  
9 Plaintiff’s First Amended Complaint is currently August 15, 2025.

10 4. Following the filing of the Amended Complaint, Plaintiff and Defendants met and  
11 conferred and Plaintiffs agreed to provide Defendants with a one-week extension of time to  
12 respond to the First Amended Complaint, making any responses due by **August 22, 2025**. Good  
13 cause exists for this extension as counsel for certain Defendants will be traveling due to pre-  
14 planned commitments and unavailable during portions of the current response period.

15 5. This is the first request for an extension of the deadline to respond to the First  
16 Amended Complaint.

17  
18 IT IS SO ORDERED.

19   
20 \_\_\_\_\_  
21 Hon. Maximiliano D. Couvillier, III  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: August 13, 2025  
24 \_\_\_\_\_

25 Respectfully submitted,

26 Dated: August 7<sup>th</sup> 2025

27 THE 702 FIRM INJURY ATTORNEYS

KNIGHT & RYAN PLLC

28 By: /s/ Geoffrey C. Parker  
Michael C. Kane, #10096  
mike@the702firm.com

By: /s/ Robert A. Ryan  
Robert A. Ryan, #12084  
robert@knightryan.com

Bradley J. Myers, #8857  
brad@the702firm.com  
Joel S. Hengstler, #11597  
joel@the702firm.com  
8335 W. Flamingo Road  
Las Vegas, Nevada 89147  
Tel: (702) 776-3333  
Fax: (702) 505-9787

HILTON PARKER LLC  
Geoffrey C. Parker, #16952  
gparker@hiltonparker.com  
Jonathan L. Hilton, #16889  
jhilton@hiltonparker.com  
7658 Slate Ridge Boulevard  
Reynoldsburg, Ohio 43068  
Tel: (614) 992-2277  
Fax: (614) 927-5980  
*Attorneys for Plaintiff*

MCDONALD CARANO LLP

By: /s/ Elise H. Yu  
Kristen T. Gallagher, Nevada Bar No.  
9561  
2300 W. Sahara Avenue, Suite 1200  
Las Vegas, NV 89102  
Telephone: (702) 873-4100  
Email: kgallagher@mcdonaldcarano.com

Ann H. MacDonald (admitted *Pro Hac*  
*Vice*)  
ARENTFOX SCHIFF LLP  
233 South Wacker Drive, Suite 7100  
Chicago, IL 60606  
Telephone: (312) 258-5548  
Email: ann.macdonald@afslaw.com

Elise H. Yu (admitted *Pro Hac Vice*)  
ARENTFOX SCHIFF LLP

Scott A. Knight, #9083  
scott@knightryan.com  
8880 W. Sunset Road Suite 130  
Las Vegas, Nevada 89148  
Tel: (702) 462-6083  
Fax: (702) 462-6084

DLA PIPER LLP (US)  
Darryl Tarver (*pro hac vice* forthcoming)  
darryl.tarver@us.dlapiper.com  
Alexa Ain (*pro hac vice* forthcoming)  
alexa.ain@us.dlapiper.com  
Ellen E. Dew (admitted *pro hac vice*)  
650 S Exeter Street Suite 1100  
Baltimore, Maryland 21202-4576  
Tel: 410.580.3000  
Fax: 410.580.3001

*Attorneys for Defendants*  
*MGM Resorts International,*  
*The Mirage Casino-Hotel, LLC,*  
*and New Castle, LLC*

SNELL & WILMER

By: /s/ Nicole Perry  
Patrick G. Byrne, Nev. Bar # 7636  
pbyrne@swlaw.com

Dawn L. Davis, Nev. Bar #. 13329  
ddavis@swlaw.com  
1700 S. Pavilion Center Drive, Suite 700  
Las Vegas, Nevada 89135  
Telephone: (702) 784-5275  
Fascimile: (702) 784-5252

JONES DAY  
Bethany Biesenthal (admitted *Pro Hac Vice*)  
bbiesenthal@jonesday.com  
Allison McQueen (admitted *Pro Hac Vice*)  
amcqueen@jonesday.com  
110 North Wacker Drive, Suite 4800  
Chicago, Illinois 60606

350 South Main Street, Suite 210  
Ann Arbor, MI 48104  
Telephone: (734) 222-1556  
Facsimile: (734) 222-1501  
Email: elise.yu@afslaw.com

*Counsel for Defendants*  
*Parball Newco, LLC, PHWLTV, LLC, and*  
*Rio Properties, LLC*

Telephone: (312) 782-3939  
Facsimile: (312) 782-8585

Nicole Perry (admitted *Pro Hac Vice*)  
nmperry@jonesday.com  
717 Texas Street, Suite 3300  
Houston, Texas 77002  
Telephone: (832) 239-3939  
Facsimile: (832) 239-3600

*Attorneys for Defendant*  
*Wynn Las Vegas, LLC*

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

KEMP JONES, LLP

By: /s/ Emily L. Dyer  
Gregory A. Brower  
Nevada Bar No. 5232  
Emily L. Dyer  
Nevada Bar No. 14512  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106  
Telephone: (702) 382-2101  
Email: gbrower@bhfs.com  
edyer@bhfs.com

By: /s/ Kyle T. Orne  
Nathanael R. Rulis, Nev. Bar #11259  
n.rulis@kempjones.com  
3800 Howard Hughes Parkway, 17<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
Tel: (702) 385-6000  
Fax: (702) 385-6001

Emily Garnett (admitted *Pro Hac Vice*)  
BROWNSTEIN HYATT FARBER  
SCHRECK, LLP  
675 15th Street, Suite 2900  
Denver, CO 80202  
Telephone: (303) 223-1147  
Email: egarnett@bhfs.com

DLA PIPER LLP (US)  
David Sager (admitted *pro hac vice*)  
david.sager@dlapiper.com  
51 John F. Kennedy Parkway, Suite 120  
Short Hills, New Jersey 07078  
Tel: (973) 520-2570

*Counsel for Defendant*  
*Treasure Island LV, LLC*

Kyle Orne (admitted *pro hac vice*)  
kyle.orne@dlapiper.com  
2525 East Camelback Road, Suite 1100  
Phoenix, Arizona 85016  
Tel: (480) 606-5172  
Fax: (480) 606-5527

*Counsel for Defendant*  
*Venetian Las Vegas Gaming, LLC*